

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

TERESA ROSALES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CIVIL ACTION NO. 05-11442 PBS
	)	
MANHATTAN ASSOCIATES, INC.,	)	
	)	
Defendant.	)	
	)	

**JOINT STATEMENT**

Pursuant to Local Rule 16.1, the Parties hereby propose the following agenda for the Scheduling Conference and Joint Discovery Plan and Schedule for filing motions:

**I. PROPOSED AGENDA FOR SCHEDULING CONFERENCE.**

The Parties' proposed joint discovery plan and schedule for dispositive motions.

The Defendant does not consent to trial by Magistrate Judge.

**II. PROPOSED JOINT DISCOVERY PLAN AND SCHEDULE FOR DISPOSITIVE MOTIONS.**

- A. Pursuant to Rule 26, the parties shall make initial disclosures ten days after disposition of Defendant's pending motion for summary judgment, if the court denies the motion;
- B. December 30, 2005: All motion to amend the pleadings shall be filed on or before this date;
- C. March 1, 2006: All discovery, including depositions of non-expert witnesses shall be completed on or before this date;
- D. May 1, 2006: Dispositive motions to be filed, with oppositions to be filed by May 31, 2006; and
- E. July 1, 2006: Final Pretrial Conference and Trial Date to be set by the Court.

**III. CERTIFICATION BY COUNSEL.**

All parties will consider ADR at an appropriate future time and will separately file certifications pursuant to Local Rule 16.1(D)(3) on or before the date of the Scheduling Conference.

PLAINTIFF TERESA ROSALES

MANHATTAN ASSOCIATES, INC.

By her attorney,

By its Attorneys,

/s/ John F. Maher  
John F. Maher  
BBO# 314100  
50 Pleasant Street  
Arlington, MA 02476  
(781) 641-4889

/s/ Heidsha Sheldon  
Peter S. Brooks (BBO # 058980)  
Heidsha Sheldon (BBO # 655263)  
SEYFARTH SHAW LLP  
World Trade Center East  
Two Seaport Lane  
Suite 300  
Boston, MA 02210-2028  
Telephone: (617) 946-4800  
Telecopier: (617) 946-4801

DATED: August 30, 2005